

# EXHIBIT 1

**Category No. 80:** Documents sufficient to show any incentives, awards, bonuses, compensation, or special payments provided by Sisvel, now or in the past, to inventors, including without limitation named inventors, employees or anyone acting on Sisvel's behalf, in consideration of filing patents or patent applications that may be or are declared essential to a relevant standard.

**Category No. 81:** All documents relating to whether the Asserted Patents are essential to any relevant standard, including but not limited to, any declarations, undertakings, or claims by Sisvel, Wilus, and/or SK Telecom to any SSO and/or SSO working group or committee.

**Category No. 82:** All documents relating to disclosure or potential disclosure to an SSO and/or SSO working group or committee, including but not limited to IEEE, of patents or patent applications essential or potentially essential to the IEEE standards.

**Category No. 83:** All documents relating to industry customs, practices, or policies with respect to the licensing of IPR claimed to be essential to any relevant standard.

**Category No. 84:** All documents relating to the value of the Asserted Patents, including but not limited to their value separately, in any combination, and/or as part of any portfolio.

**Category No. 85:** All documents relating to licensing of any Sisvel, Wilus, and/or SK Telecom IPR on FRAND terms.

**Category No. 86:** All licenses, releases, or covenants not to sue regarding the Asserted Patents.

**Category No. 87:** All licenses, releases, or covenants not to sue regarding the patents within the Sisvel Wi-Fi 6 Portfolio.

**Category No. 88:** Documents related to Sisvel's and/or Wilus's FRAND positions in any prior litigation, arbitration, or negotiation, including but not limited to all documents related to Sisvel's and/or Wilus's FRAND contentions in litigation, arbitration or negotiation in Sisvel's and/or Wilus's disputes with any other companies offering to license one or more purportedly standards-essential patents to Sisvel and/or Wilus, including but not limited to Sisvel's and/or Wilus's expert reports, pleadings, briefing, witness statements, deposition and trial transcripts, correspondence, and licensing presentations related to Sisvel's and/or Wilus's FRAND contentions for each such dispute.

**Category No. 89:** Documents sufficient to show for any license to the Asserted Patents, either separately, in any combination, and/or as part of any portfolio, the licensee(s), the date of the license, the terms of the license including the royalty rates and lump-sum payments, and the payments made over time under the license.

**Category No. 90:** Documents sufficient to identify all persons involved in licensing the Asserted Patents.

**Category No. 91:** Documents sufficient to identify all persons involved in licensing the Sisvel Wi-Fi 6 Portfolio.

**Category No. 92:** All documents relating to any potential or actual agreement, whether formal or informal, among or between you and any person to refrain from disclosing to any other person the terms of any license to any of the Asserted Patents or to any IPR claimed to be essential to any relevant standard.

**Category No. 93:** All documents and communications relating to licensing of the Asserted Patents, including but not limited to negotiations, discussions, and/or correspondence, regardless of whether or not a license was executed.

**Category No. 94:** All documents relating to FRAND terms or conditions or the meaning, effect, or application of the concept of FRAND terms or conditions to licensing IPR, including but not limited to any public statements, statements to SSOs and/or SSO working groups or committees, statements in legal and/or administrative proceedings, statements to actual or potential licensees, presentations, opinions, and/or analyses.

**Category No. 95:** All documents relating to any legal and/or administrative proceeding in which Sisvel has been a party where the issue of a party's obligation to grant a license to IPR under FRAND terms or conditions arose in the proceeding.

**Category No. 96:** All documents relating to any request Sisvel has made for an injunction or exclusionary order in any legal and/or administrative proceeding throughout the world regarding any IPR Sisvel has declared as essential or potentially essential to any relevant standard.

**Category No. 97:** All documents relating to any meeting, discussion, or communication with HP regarding any of the Asserted Patents.

**Category No. 98:** All documents relating to any attempt by Sisvel, Wilus, and/or SK Telecom to research, develop, design, manufacture or sell items that embody or practice any of the Asserted Patents.

**Category No. 99:** All documents that Sisvel has provided to, received from, or discussed (orally or in writing) with any consultant or expert in this action, whether testifying or not.

**Category No. 100:** All documents that Sisvel intends to rely on in this action.

**Category No. 101:** All documents relating to any lawsuit involving Sisvel in which essential or declared essential patents were asserted or in which FRAND licensing was in issue including, without limitation, any pleadings, declarations, transcripts of testimony, orders and decisions entered by the Court.

**Category No. 102:** All documents relating to any submissions by or on behalf of Sisvel to any Court, tribunal, regulatory body or agency concerning standard essential patents or FRAND licensing.

**Category No. 103:** All documents relating to any submissions by or on behalf of Sisvel and/or Wilus to any Court, tribunal, regulatory body or agency concerning the availability of injunctive relief for any patent or other IPR that is or has been declared to be essential to a standard.